

PHILIP D. MURPHY Governor

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State of New Jersey Office of the Attorney General Department of Law and Public Safety Division of

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LAW

GURBIR S. GREWAL
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April 28, 2021

Hon. Leda Dunn Wettre, U.S.M.J. Martin Luther King Building & U.S. Courthouse 50 Walnut Street, Room 4015 Newark, NJ 07102

Re: Polynice v. New Jersey Department of Corrections, et. al Civ. Dkt. # 2:19-16875-MCA-LDW

Dear Judge Wettre,

The undersigned counsel represents the Department of Corrections and Administrator George Robinson (hereinafter "Represented Defendants") in the above captioned matter.

Plaintiff's counsel and I conferred and decided to submit a joint status update. Plaintiff served Represented Defendants with discovery requests on February 8, 2021. Represented Defendants served Plaintiff with discovery requests on March 28, 2021. Defendants sent responses to Plaintiff on April 28, 2021 and Plaintiff has an additional 30 days to respond to Defendant's discovery demands.

Plaintiff, upon review of Represented Defendants discovery responses, may decide to amend the complaint. The current DED is June 15, 2021 and may require an extension for depositions.

Respectfully submitted,

GURBIR S. Grewal ATTORNEY GENERAL OF NEW JERSEY

By: s/Chanell Branch

Chanell Branch, Deputy Attorney General

